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REPLY TO MONTCLAIR OFFICE

February 5, 2020

JOINT LETTER-MOTION
TO CONTINUE DATE FOR STATUS CONFERENCE

Filed via ECF

Hon. Naomi Reice Buchwald, Senior U.S.D.J.
Moynihan United States Courthouse
500 Pearl Street
New York, N.Y. 10007

Re: United States v. Tsani Russell, 19-cr-554(NRB)

Dear Judge Buchwald:

This letter is respectfully submitted by undersigned counsel as a joint request by the parties to establish a new date for the next status conference in this case, now scheduled for February 11 at 2:30pm. The parties jointly request a continuance of approximately 30 days. After conferring, the parties specifically request the afternoon of March 16, 2020 if that date and time are convenient to Your Honor. If not, we will work with your staff to select a date that is convenient to all concerned. The Court is respectfully advised that the parties are engaged in productive discussions of a potential resolution of the case. The defense consents to a waiver of the Speedy Trial Act timelines.

The Court's time and attention to this matter are appreciated.

Respectfully yours,
/s/ David A. Ruhnke
David A. Ruhnke (Ruhnke & Barrett)
Diane Ferrone (Law Offices of Diane Ferrone)
Counsel to Tsani Russell

*The
conference
is
adjourned
until
March 24,
2020
at 2:30.
Speedy*

*trial time
included.*

*Naomi Reice Buchwald
2/10/20*